

DECLARATION OF TRICIA L. LEGITTINO

I, Michael Gerard Fletcher, declare:

3 1. I am an attorney admitted to practice before the bar of this Court and am a member
4 of Frandzel Robins Bloom & Csato, L.C., attorneys for secured creditors Angela C. Sabella
5 ("Sabella") and Dynamic Finance Corporation's ("Dynamic") (collectively "Dynamic/Sabella") in
6 this matter. This declaration is in support of Dynamic/Sabella's Motion for a Stay Pending Appeal
7 of the United States Southern District Bankruptcy Court's June 2, 2008 Order (the "Order") on the
8 Trustee's Motion to Compel Discovery from Isaac Lei ("Lei") and his company the Alcon Group
9 ("Alcon") (collectively, "Lei/Alcon") ("Motion"). I have personal knowledge of the matters set
10 forth herein, and I could and would testify competently thereto if called upon to do so.

11 2. On July 11, 2008 in a telephonic conference with the Court, the parties agreed to
12 the following briefing schedule of this Motion:

- a. The Trustee's Opposition is to be filed by July 16, 2008.
- b. The Movants' Reply is to be filed on July 21, 2008.

15 3. The parties also agreed to voluntarily stay enforcement of the Order until July 25,
16 2008 to allow the Court time to decide the Motion.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct and that this declaration was executed this 11th day of July, 2008, at
19 Los Angeles, California.

/s/ Tricia L. Legittino
TRICIA L. LEGITTINO